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AUG 02 2018

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSEALEX G. TSE (CABN 152348)
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

LHK

NC

UNITED STATES OF AMERICA,

Plaintiff,

v.

VASILE MEREACRE,

Defendant.

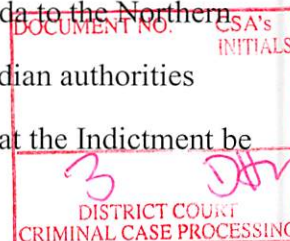
CR 18 00348

No. CR
UNITED STATES' APPLICATION AND
[PROPOSED] ORDER TO SEAL INDICTMENT
AND ARREST WARRANT AND UNSEAL FOR
THE LIMITED PURPOSE OF EXTRADITION

On August 2, 2018, a federal grand jury in the Northern District of California returned an indictment charging defendant Vasile Mereacre with one count of Conspiracy, in violation of Title 18, United States Code, Section 1030(b), and one count of Extortion Involving Computers, in violation of Title 18, United States Code, Sections 1030(a)(7)(B) and (c)(3)(A). The defendant resides in Toronto, Canada. He is a Canadian citizen with ties to Moldova.

The United States, through undersigned counsel, respectfully moves this Court to seal the Indictment and arrest warrant in order to prevent the defendant from fleeing from Canada to Moldova or another country. The United States intends to extradite the defendant from Canada to the Northern District of California, and anticipates that the defendant will be arrested by Canadian authorities pursuant to a provisional arrest warrant. Therefore, the United States requests that the Indictment be

U.S.' APPLICATION AND [PROPOSED] ORDER



1 unsealed for the limiting purpose of providing it to the Canadian government to facilitate the defendant's
2 arrest and extradition.

3 DATED: 8/1/18

Respectfully submitted,

4 ALEX G. TSE
5 Acting United States Attorney

6 
7 SUSAN KNIGHT
8 Assistant United States Attorney

9 ~~[PROPOSED] ORDER~~

10 On the motion of the United States, and good cause appearing therefor, the Court HEREBY
11 ORDERS that the Indictment and arrest warrant in the above-captioned matter be sealed.

12 The Court FURTHER Orders that the Indictment is unsealed for the limited purpose of providing
13 it to Canadian authorities as part of the United States' request for a provisional arrest warrant and
14 extradition of the defendant.

15 IT IS SO ORDERED.

16 DATED: August 2, 2018

17 
18 HONORABLE NATHANAEL COUSINS
19 United States Magistrate Judge